

# **EX. 15**

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

JARI MCPHERSON,  
JERALD SAMS, and  
DANIEL MARTINEZ,  
Plaintiffs

v.

TEXAS DEPARTMENT OF  
PUBLIC SAFETY,  
Defendant.

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\* CIVIL ACTION  
\* NO. 1:20-cv-01223-DAE  
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VIDEOCONFERENCED ORAL DEPOSITION

OF

CHRISTOPHER HANSON

Monday, November 28, 2022

(REMOTELY REPORTED)

VIDEOCONFERENCED ORAL DEPOSITION OF

CHRISTOPHER HANSON, produced as a witness at the  
instance of the Plaintiffs, and duly sworn, was taken in  
the above-styled and numbered cause on Monday,  
November 28, 2022, from 9:11 a.m. to 4:43 p.m., before  
Debbie D. Cunningham, CSR, in and for the State of  
Texas, remotely reported via Machine Shorthand, pursuant  
to the Federal Rules of Civil Procedure.

--ooOoo--

<p>14</p> <p>1 until -- well, until -- we moved into this</p> <p>2 Wilbarger address; we owned that house. My</p> <p>3 wife lived there.</p> <p>4 But I got a promotion to</p> <p>5 lieutenant and moved to Waco. We have a</p> <p>6 30-mile -- there was a 30-mile policy for</p> <p>7 residents from our office. So I bought a</p> <p>8 camper and moved up to Waco, across from the</p> <p>9 office, at an RV park there; and we kept --</p> <p>10 remained keeping our house, our home in</p> <p>11 Pflugerville, where my wife lived. And I went</p> <p>12 home to her on the weekends.</p> <p>13 And then --</p> <p>14 Q. Okay. So if you don't mind, if I can</p> <p>15 stop you there so that you don't lose me again,</p> <p>16 I want you to take me step by step.</p> <p>17 What was your Waco address?</p> <p>18 A. I don't recall the exact address. It</p> <p>19 was across the street from my office, off of 35</p> <p>20 at Crest, Crest Drive. I don't even recall</p> <p>21 what the name of that place was -- it had a big</p> <p>22 Statue of Liberty on a sign above it -- maybe</p> <p>23 Crest RV Park or something. I don't recall the</p> <p>24 address.</p> <p>25 Q. So what was -- that was an RV there</p>	<p>16</p> <p>1 a physical address, then, correct?</p> <p>2 A. No, it had a physical address at the</p> <p>3 park. I just don't recall what it was.</p> <p>4 Q. Okay. If you can figure that out</p> <p>5 during the course of this deposition, we would</p> <p>6 greatly appreciate it, Captain. Okay?</p> <p>7 A. Okay.</p> <p>8 Q. Provide it to your counsel; and he</p> <p>9 can provide it to us, please.</p> <p>10 A. Yes, sir.</p> <p>11 Q. Hopefully, you will be able to do</p> <p>12 that on rather short order at the time we take</p> <p>13 a break or something like that.</p> <p>14 A. Oh, no, it shouldn't be hard. I'll</p> <p>15 probably just have to Google it.</p> <p>16 Q. Okay. And how did you acquire that</p> <p>17 physical address for an RV?</p> <p>18 A. How did I acquire it?</p> <p>19 Q. Yes, sir.</p> <p>20 I mean, you didn't just create</p> <p>21 it yourself, right?</p> <p>22 A. No, no. I drove through numerous RV</p> <p>23 lots, establishments, trying to find a vacancy</p> <p>24 and something within the mileage restriction</p> <p>25 and requirement. And I located the one across</p>
<p>15</p> <p>1 that had your address, an RV?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Now, describe for the record what an</p> <p>4 RV is.</p> <p>5 A. A recreational vehicle. It was a</p> <p>6 travel trailer.</p> <p>7 Q. It was a travel trailer?</p> <p>8 A. Right.</p> <p>9 Q. And were you actually living out of</p> <p>10 that travel trailer?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. How many days of the week were</p> <p>13 you living out of that travel trailer?</p> <p>14 A. Usually four or five days a week and</p> <p>15 then I would leave on Friday after work and go</p> <p>16 home to -- go back to my wife in Pflugerville</p> <p>17 and then return on Monday and live there</p> <p>18 through the week.</p> <p>19 Q. Okay. So you maintained your address</p> <p>20 in Waco with the RV, recreational vehicle,</p> <p>21 which was on wheels, correct?</p> <p>22 A. Yes, sir.</p> <p>23 Q. And it was in a trailer park?</p> <p>24 A. An RV park.</p> <p>25 Q. An RV park. So it didn't really have</p>	<p>17</p> <p>1 the street originally and it was almost within</p> <p>2 view of the office, but you couldn't -- at the</p> <p>3 time the guy didn't have a vacancy. And so I</p> <p>4 continued to look elsewhere and then he called</p> <p>5 me and he said he had an opening there. And so</p> <p>6 I bought a camper and moved up there and put my</p> <p>7 camper on the lot and paid the guy rent for, I</p> <p>8 don't know, nearly two years that I lived</p> <p>9 there.</p> <p>10 Q. Okay. And what was the name of this</p> <p>11 RV park?</p> <p>12 A. I think -- I don't recall exactly. I</p> <p>13 think it was Crest -- maybe Crest or Crestview.</p> <p>14 Like I said, I don't remember. It's been</p> <p>15 sometime back, but I can certainly acquire that</p> <p>16 during the break from Google.</p> <p>17 Q. Okay. That would be good, Captain.</p> <p>18 And how did the landlord or owner of that RV</p> <p>19 park determine what your address would be?</p> <p>20 What was the process?</p> <p>21 A. He picked out a slot that he had that</p> <p>22 was available and told me to park my camper in</p> <p>23 that slot, and that was my address. There's an</p> <p>24 overall address for the whole RV park, and then</p> <p>25 there were slot numbers.</p>

<p style="text-align: right;">22</p> <p>1 Q. Okay. And was that reflected on your 2 driver's license at the time? 3 A. No. 4 Q. Okay. Was it required to be 5 reflected on your driver's license as your 6 full-time residence? 7 A. Yes. 8 Q. Okay. But you didn't do that? 9 A. No, sir. 10 Q. And is that a violation of the law? 11 MR. HARRIS: Object to the form 12 of the question. 13 Q. (BY MR. MUNGO) You're in law 14 enforcement. You can answer that question. 15 A. Yes. 16 Q. Okay. Did you report that, 17 self-report that, to your supervisor? 18 A. No, sir. 19 Q. Isn't it required, along with meeting 20 the residency requirement and the mileage 21 criteria, to do so? 22 A. I don't know that answer. 23 Q. Did you care to explore to try to 24 determine the truth of the question that I just 25 asked you?</p>	<p style="text-align: right;">24</p> <p>1 Q. Do you know the statute of 2 limitations on a -- is that a criminal or civil 3 violation, not putting your permanent address 4 on your driver's license? 5 A. It's a ticketable offense. 6 Q. It's a ticketable offense. 7 Okay. And is there points that 8 come along with that ticket? 9 A. I don't recall. I don't know. 10 Q. You don't know? 11 A. No, sir. 12 Q. All right. So you received all your 13 mail at the Pflugerville address? 14 A. I did. 15 Q. Okay. And what was the mileage to 16 your duty station from Pflugerville? 17 A. I don't know the answer to that. 18 It's approximately an hour-and-45-minute drive, 19 so. 20 Q. Okay. So what was the residency 21 mileage requirement that you were attempting to 22 meet by using this RV trailer and parking it at 23 this RV trailer park with the general address 24 and the specific parking slot? 25 A. We had a 30-mile requirement.</p>
<p style="text-align: right;">23</p> <p>1 A. No, I did not. 2 Q. And why not? 3 A. I don't recall. 4 Q. So I understand when you say you 5 don't recall, is that because you don't 6 think -- you can't think of any thinking that 7 you engaged in at the time to consider that 8 question? 9 A. Yes, I can't think of any. 10 Q. Okay. Have you straightened that out 11 since about the address on your driver's 12 license, sir? 13 A. Yes. 14 Q. Are you going to report the fact that 15 you violated the law -- 16 MR. HARRIS: Object -- 17 Q. -- to your supervisor? 18 MR. HARRIS: Object to the form 19 of the question. 20 Q. (BY MR. MUNGO) You can answer, sir. 21 A. No. 22 Q. You're not. Why not? 23 A. I'm in compliance now with the 24 address requirement on the driver's license, so 25 I don't think it's relevant.</p>	<p style="text-align: right;">25</p> <p>1 Q. It was a 30-mile requirement? 2 A. Yes, sir. 3 Q. And so which put you within 30 miles? 4 That meant that you had to be within 30 miles 5 of your duty station; is that correct? 6 A. Yes. 7 Q. Okay. And which put you in 30 miles 8 of your duty station, Waco or Pflugerville? 9 A. The Waco address, the Waco travel 10 trailer. 11 Q. Okay. And within how many miles did 12 the Waco address put you to your duty station? 13 A. Maybe a mile air miles. 14 Q. I'm so sorry, sir? 15 A. Maybe a mile as a crow flies. 16 Q. Oh, so you were just within a mile's 17 drive to your duty station? 18 A. Yeah. 19 Q. Okay. Very good. 20 Okay. And how many miles were 21 you out from your duty station from the 22 Pflugerville permanent address? 23 A. I don't recall the exact mileage, but 24 I know it's farther than 30 miles. 25 Q. Okay. Do you have any sense for</p>

<p>34</p> <p>1 MR. HARRIS: Object to form.</p> <p>2 A. He came three months after I got</p> <p>3 there, shortly after I got there; and then he</p> <p>4 lived there after I left.</p> <p>5 Q. (BY MR. MUNGO) Any other Texas</p> <p>6 Department of Public Safety personnel,</p> <p>7 troopers, that resided at that RV address?</p> <p>8 A. No.</p> <p>9 Q. Are you sure?</p> <p>10 A. Not then.</p> <p>11 Q. Do you know some that's residing</p> <p>12 there now?</p> <p>13 A. No, sir.</p> <p>14 Q. Well, who lives there now that you</p> <p>15 know of?</p> <p>16 A. At the park?</p> <p>17 Q. Yeah. The Waco RV trailer park, yes.</p> <p>18 A. I don't know for sure of anyone that</p> <p>19 lives there now unless the owner of it still</p> <p>20 resides there.</p> <p>21 Q. No, no. I mean troopers, employees</p> <p>22 of the Texas Department of Public Safety.</p> <p>23 A. I have no idea. I have no idea. I</p> <p>24 don't know anybody there. I don't -- I don't</p> <p>25 live there anymore. I've lived here for a good</p>	<p>36</p> <p>1 Lieutenant Derek Evans was living at the same</p> <p>2 RV park in Waco as you were?</p> <p>3 A. Yes.</p> <p>4 Q. How long, if you know, was</p> <p>5 Captain Schwartz knowledgeable of this?</p> <p>6 A. From the beginning of my promotion</p> <p>7 and taking the lieutenant's position up in</p> <p>8 Waco.</p> <p>9 Q. Okay. From the beginning of your</p> <p>10 promotion. Promotion to lieutenant?</p> <p>11 A. Yes.</p> <p>12 Q. When were you promoted to lieutenant?</p> <p>13 A. I don't recall the exact date.</p> <p>14 Q. Do you recall the year?</p> <p>15 A. I want to say either 2017 -- I just</p> <p>16 don't recall. It's been too long back.</p> <p>17 Q. I understand. I suffer from that</p> <p>18 malady myself.</p> <p>19 Have you ever known the</p> <p>20 residency mileage requirements by the Texas</p> <p>21 Department of Public Safety to be varied from?</p> <p>22 A. No. Each district has their own</p> <p>23 specific policy. So, in my experience, where</p> <p>24 I've held duty station, I believe Region 6 is</p> <p>25 still 30 miles, which is Austin, Waco, Temple,</p>
<p>35</p> <p>1 deal of time.</p> <p>2 Q. Are you sure?</p> <p>3 A. Yes.</p> <p>4 Q. Is Derek Evans still a lieutenant?</p> <p>5 A. Yes.</p> <p>6 Q. Do you know whether Derek Evans has</p> <p>7 claimed that location as his permanent</p> <p>8 residence?</p> <p>9 A. I believe --</p> <p>10 MR. HARRIS: Object to the form</p> <p>11 of the question.</p> <p>12 Q. (BY MR. MUNGO) You can answer the</p> <p>13 question, sir.</p> <p>14 A. I believe he did while he resided</p> <p>15 there.</p> <p>16 Q. Do you know whether or not he put</p> <p>17 that address -- had that address placed on his</p> <p>18 driver's license?</p> <p>19 MR. HARRIS: Object to form.</p> <p>20 Q. (BY MR. MUNGO) The RV trailer</p> <p>21 address.</p> <p>22 A. I don't know.</p> <p>23 Q. Who was his supervisor?</p> <p>24 A. Steven Schwartz.</p> <p>25 Q. Does Steven Schwartz know that</p>	<p>37</p> <p>1 San Antonio. Those are all 30-mile</p> <p>2 requirements. And then the Capitol District</p> <p>3 was made 50 miles years ago, before I got</p> <p>4 there, due to location; and at that time they</p> <p>5 had numerous individuals that were working as</p> <p>6 troopers that worked there that lived outside</p> <p>7 of that mileage restriction before they ever</p> <p>8 made it a requirement that they have a mileage</p> <p>9 restriction.</p> <p>10 I don't recall what exact year</p> <p>11 that they added -- the Capitol Police Troopers</p> <p>12 originally did not have take-home vehicles.</p> <p>13 So they had no mileage restriction, and they</p> <p>14 added -- I don't remember, like I said, which</p> <p>15 year; but they gave the -- all the vehicles to</p> <p>16 the Capitol Police Troopers, they issued them</p> <p>17 vehicles. At that time they made a mileage</p> <p>18 restriction of 50 miles; and I think that was</p> <p>19 to encompass, you know, where everybody lived</p> <p>20 at that time to make sure that nobody was out</p> <p>21 of compliance because they were given a car</p> <p>22 before they were required to live within a</p> <p>23 certain mileage of the office, so.</p> <p>24 Q. Okay. So now, back to my question:</p> <p>25 Have you ever known the Texas Department of</p>

<p>114</p> <p>1 harassment --</p> <p>2 A. No.</p> <p>3 Q. -- attempting to hug and kiss her?</p> <p>4 A. No, I don't know of a complaint being</p> <p>5 filed.</p> <p>6 Q. Okay. Did she complain to you about</p> <p>7 that?</p> <p>8 A. She didn't complain to me. She told</p> <p>9 me it happened. And I asked her what she</p> <p>10 wanted me to do about it. And she said,</p> <p>11 "Nothing," that she had dealt with it.</p> <p>12 Q. Okay. I see. What did you do about</p> <p>13 it?</p> <p>14 A. That's what I did, nothing.</p> <p>15 Q. I see. I see. Was that the</p> <p>16 appropriate response?</p> <p>17 MR. HARRIS: Objection to the</p> <p>18 form of the question.</p> <p>19 Q. (BY MR. MUNGO) Sir, was that the</p> <p>20 appropriate response?</p> <p>21 A. I don't know.</p> <p>22 Q. So do you know what your duties and</p> <p>23 responsibilities are when a -- when an employee</p> <p>24 comes to you and tells you they're being</p> <p>25 sexually harassed?</p>	<p>116</p> <p>1 correct?</p> <p>2 A. It isn't my testimony. I don't have</p> <p>3 an answer to that.</p> <p>4 Q. So you're simply ignorant of your --</p> <p>5 for whether or not you had any responsibilities</p> <p>6 to act upon receiving that report from</p> <p>7 Marisela, right?</p> <p>8 A. I don't know the answer to that.</p> <p>9 Q. So do you know the answer to whether</p> <p>10 or not you know what your obligations were?</p> <p>11 A. I just answered that. I don't know.</p> <p>12 Q. Do you remember receiving a complaint</p> <p>13 or becoming knowledgeable of a complaint from</p> <p>14 or by Dorinisha Livingston?</p> <p>15 A. No.</p> <p>16 Q. You were never knowledgeable of a</p> <p>17 complaint being made by Dorinisha Livingston.</p> <p>18 Is that your testimony here?</p> <p>19 A. About what?</p> <p>20 Q. Anything.</p> <p>21 A. Not that I recall.</p> <p>22 Q. What about racial discrimination?</p> <p>23 A. Not that I recall.</p> <p>24 Q. Okay. What about Patrick Alonzo?</p> <p>25 Are you aware of Patrick Alonzo, an</p>
<p>115</p> <p>1 A. I don't know specifically. I don't</p> <p>2 know all the verbiage.</p> <p>3 Q. Do you know what your duties and</p> <p>4 responsibilities are when an employee complains</p> <p>5 of being harassed on the basis of race?</p> <p>6 A. No, not particularly.</p> <p>7 Q. Were you not considered an agent of</p> <p>8 notice for the Texas Department of Public</p> <p>9 Safety?</p> <p>10 MR. HARRIS: Object to the form</p> <p>11 of the question.</p> <p>12 A. I don't know the answer to that.</p> <p>13 Q. (BY MR. MUNGO) Oh, you never recall</p> <p>14 being designated as an agent of notice?</p> <p>15 A. No, sir.</p> <p>16 Q. And that you had to report Marisela's</p> <p>17 complaint of sexual harassment by</p> <p>18 Lieutenant Saldivar?</p> <p>19 A. No.</p> <p>20 Q. Okay. It isn't your testimony here</p> <p>21 today that you were not responsible for taking</p> <p>22 action against Lieutenant Saldivar on the basis</p> <p>23 of Ms. Marisela -- I know I'm mispronouncing</p> <p>24 her name -- your administrative assistant's</p> <p>25 complaint against him for sexual harassment,</p>	<p>117</p> <p>1 African American, just like Dorinisha</p> <p>2 Livingston, an African American, who complained</p> <p>3 about racial discrimination?</p> <p>4 A. Yes.</p> <p>5 Q. So you are aware that Patrick Alonzo</p> <p>6 complained of racial discrimination?</p> <p>7 A. Yes.</p> <p>8 Q. How did you become aware of it?</p> <p>9 A. I'm the subject of the complaint.</p> <p>10 Q. Okay. And what did Mr. Patrick</p> <p>11 Alonzo complain that you did?</p> <p>12 A. That I disseminated racially</p> <p>13 insensitive photos via text.</p> <p>14 Q. Okay. Was that true?</p> <p>15 A. Yes.</p> <p>16 Q. Was the investigation against you</p> <p>17 ever sustained?</p> <p>18 A. No, it's still in progress.</p> <p>19 Q. It's still in progress. Okay.</p> <p>20 A. It was filed in August of this year.</p> <p>21 Q. Okay. Patrick Alonzo also complained</p> <p>22 that you, in cooperation with Captain Koenig,</p> <p>23 were racially biased against</p> <p>24 Lieutenant Martinez, correct?</p> <p>25 A. I don't -- that wasn't in my</p>

<p style="text-align: right;">258</p> <p>1 valuable intelligence and bring it back to us  2 so we could prepare and be actively ready for  3 when these folks showed up.  4 Q. And that sounds like exceptional  5 work.  6 A. It was.  7 Q. Wow. Yeah, certainly above average.  8 Did you receive an award for  9 your accomplishments in 2020?  10 A. I don't know if it was for  11 accomplishments. I got a Regional Director's  12 Award for a situation that took place with an  13 assault on one of our Black troopers by members  14 of the crowd on the riot day.  15 Q. And that was during the Black Lives  16 Matter assemblies, right?  17 A. Black Lives Matter, George Floyd, a  18 number of different groups were part of that.  19 Q. Okay. So was the title of that award  20 that you received Excellence in  21 Countersurveillance during George Floyd  22 rallies?  23 A. I don't recall what it exactly said  24 on it. I know it was for taking action when  25 one of our troopers was being specifically</p>	<p style="text-align: right;">260</p> <p>1 Mr. McPherson may have made to any of the  2 initiatives that you engaged in that resulted  3 in your award. Did Mr. McPherson play any role  4 in those dynamics?  5 A. I guess. I don't know if it resulted  6 in my award. You know, the action that I got  7 the award for occurred before Jari was doing  8 his investigative work; but he was able to  9 identify some people as related to some of  10 those organizations.  11 Q. Well, you just indicated, though, he  12 did exceptional work. Did Mr. McPherson  13 receive an award for his work?  14 A. Not that I'm aware of. I think they  15 gave an award to some of the people on the task  16 force that participated in the task force. I  17 don't know if he got one of those awards or  18 not.  19 Q. Okay. Do you think that  20 Mr. McPherson deemed an award based upon his  21 exceptional work as you described it earlier?  22 A. It just depends on the circumstances.  23 I mean, he did a great job. You know, they  24 don't hand out awards every day for  25 different -- you know, for everything; but he</p>
<p style="text-align: right;">259</p> <p>1 assaulted and gathering -- getting those folks  2 off of him, protecting his face, and later  3 gathering information via photos and such to  4 get some of them identified.  5 Q. Okay. Did Special Agent McPherson  6 contribute in any way to the initiative that  7 you were involved in and that resulted in your  8 award?  9 A. Yes, sir. After the fact of that  10 award, they put together a task force that  11 Danny was, like, the lieutenant over the task  12 force to try to identify some of the people  13 from the footages that we captured during the  14 specific rioting. And after that, Jari was  15 able to get into one of the subversive groups  16 that was doing a lot of damage and detriment  17 and was able to correspond directly with them  18 and meet with them and helped us identify some  19 people and get information beforehand when, you  20 know, they were going to be gathering and such.  21 Q. And all of that was part of your  22 initiatives which resulted in your award,  23 right?  24 A. No, the award came before that.  25 Q. I meant contributions that</p>	<p style="text-align: right;">261</p> <p>1 did a good job. I certainly recognized him. I  2 commended him all the time and talked to him  3 about it, and I noted it in his performance  4 evaluations specifically.  5 Q. Okay. Now, did you use what Special  6 Agent McPherson did in 2020 on your HR 113  7 which assisted you in making Captain?  8 A. I don't recall that. I'm not -- I  9 don't recall. That 113 has changed so many  10 times, I don't recall.  11 Q. Okay.  12 MR. MUNGO: Excuse me. Just one  13 second. I'm at the very end of my list here.  14 I just need to go off for just a minute.  15 THE REPORTER: Shall I take us  16 off the record?  17 MR. HARRIS: I think he's saying  18 he's just going to be right back, so...  19 THE REPORTER: Okay.  20 MR. MUNGO: Yeah, go ahead and  21 go off the record.  22 THE REPORTER: We're going off  23 the record at 4:30 p.m.  24 (Off the record from 4:30  25 to 4:37 p.m.)</p>

<p style="text-align: right;">262</p> <p>1 THE REPORTER: We're back on the  2 record at 4:37 p.m.  3 Q. (BY MR. MUNGO) Mr. Hanson, are you  4 aware of a lifesaving award that Justin Murphy  5 and Lieutenant Martinez were nominated to  6 receive?  7 A. I don't know if they were nominated  8 for an award, no. I know they had an event  9 where they were on the roof with a guy that was  10 going to jump, but I don't know if they were  11 nominated for one.  12 Q. You're not aware that Nate Head  13 nominated both Justin Murphy, Special  14 Agent Justin Murphy, and Lieutenant Danny  15 Martinez to receive a lifesaving award? You're  16 not aware that he nominated them?  17 MR. HARRIS: Objection, asked  18 and answered.  19 Q. (BY MR. MUNGO) Go ahead, sir.  20 A. No. I know he mentioned it to chain  21 of command. I wasn't there that day, but I  22 think he witnessed it out the window or  23 something.  24 Q. Okay. So you never received a memo  25 from Mr. Head nominating Justin Murphy and</p>	<p style="text-align: right;">264</p> <p>1 such a nomination of Justin Murphy -- I just  2 want to be clear. You have no knowledge of the  3 nomination by Nate Head of Justin Murphy and  4 Lieutenant Danny Martinez to receive a  5 lifesaving award? No knowledge at all of such  6 a nomination; is that correct?  7 MR. HARRIS: Objection, asked  8 and answered.  9 A. I don't recall that.  10 Q. (BY MR. MUNGO) You don't recall  11 that?  12 A. No, I was told about it; but I don't  13 recall ever getting anything in writing.  14 Q. Who told you about it?  15 A. Nate.  16 Q. So why didn't you act on it?  17 A. I don't know the answer to that. I  18 didn't get -- not that I recall ever getting  19 anything in writing to submit. I know I told  20 Captain Koenig about it. I wasn't sure of all  21 the details as I wasn't there.  22 Q. And Nate told you within the 30 days  23 of the event, correct?  24 A. Yes.  25 Q. And you sat on it? He told you this,</p>
<p style="text-align: right;">263</p> <p>1 Martinez, Lieutenant Martinez, for the  2 lifesaving award? You never received a memo  3 from him? I just want to make sure your  4 testimony is clear.  5 A. Not that I recall.  6 Q. Okay. Once you receive such a  7 nomination, what are your responsibilities with  8 regard to that nomination?  9 MR. HARRIS: Object to the form  10 of the question.  11 A. If I were to get that, I would have  12 to let the chain of command know about the  13 event.  14 Q. (BY MR. MUNGO) And you would have to  15 do that within 30 days, correct?  16 A. I don't know.  17 Q. You don't know?  18 A. No, sir.  19 Q. So you don't know what your  20 responsibilities would be after receiving a  21 nomination for an award to go to special agents  22 and troopers and lieutenants within your  23 organization; is that correct?  24 A. No, not specifically.  25 Q. Okay. And you have no knowledge of</p>	<p style="text-align: right;">265</p> <p>1 and you sat on it; is that correct? Am I  2 understanding your testimony correctly?  3 A. No, sir, I don't believe I sat on it.  4 I believe I told Mark Koenig, the captain,  5 immediately; or Nate might have brought it up  6 in front of all the lieutenants and the  7 captain.  8 Q. What evidence do you have that you  9 told Koenig about the nomination of Justin  10 Murphy and Lieutenant Danny Martinez to receive  11 the lifesaving award, sir?  12 A. I don't have any evidence.  13 Q. Is it true that you did not forward  14 this nomination for a lifesaving award in  15 writing to Captain Koenig because you harbor  16 racial animus towards persons of color?  17 A. No.  18 Q. How do you disassociate the admitted  19 racially offensive pictures that you texted out  20 over the group text from this treatment of  21 failure to forward a nomination of Justin  22 Murphy and Lieutenant Danny Martinez for a  23 lifesaving award to Captain Koenig?  24 MR. HARRIS: Objection to the  25 question.</p>



<p>266</p> <p>1 A. I don't know the answer to that. I</p> <p>2 don't draw a correlation at all.</p> <p>3 Q. (BY MR. MUNGO) All right. And how</p> <p>4 long have you been a captain?</p> <p>5 A. Oh, since February of this year.</p> <p>6 Q. February of this year.</p> <p>7 And how many people, department,</p> <p>8 Texas Department of Public Safety are you</p> <p>9 supervising -- do you have supervising</p> <p>10 responsibility over?</p> <p>11 A. Let's see. Roughly twelve direct and</p> <p>12 then some in between us, but I have twelve</p> <p>13 under me.</p> <p>14 Q. All right. That's it. I'm done.</p> <p>15 MR. MUNGO: I pass the witness.</p> <p>16 MR. HARRIS: We will reserve our</p> <p>17 questions for trial, and we ask that the</p> <p>18 witness be given an opportunity to read and</p> <p>19 sign the transcript.</p> <p>20 THE REPORTER: This concludes</p> <p>21 the deposition at 4:43 p.m.</p> <p>22 (Deposition concluded at 4:43 p.m.)</p> <p>23 --ooOoo--</p> <p>24</p> <p>25</p>	<p>268</p> <p>1 I, CHRISTOPHER HANSON, have read the</p> <p>2 foregoing deposition and hereby affix my signature that</p> <p>3 same is true and correct, except as noted herein.</p> <p>4</p> <p>5 _____</p> <p>6 CHRISTOPHER HANSON</p> <p>7</p> <p>8 THE STATE OF _____ )</p> <p>9 Before me, _____, on</p> <p>10 this day personally appeared CHRISTOPHER HANSON, known</p> <p>11 to me (or proved to me under oath or through</p> <p>12 _____) (description of identity card or other</p> <p>13 document) to be the person whose name is subscribed to</p> <p>14 the foregoing instrument and acknowledged to me that</p> <p>15 they executed same for the purposes and consideration</p> <p>16 therein expressed.</p> <p>17 Given under my hand and seal of office on</p> <p>18 this ____ day of _____, _____.</p> <p>19</p> <p>20</p> <p>21 _____</p> <p>22 NOTARY PUBLIC IN AND FOR</p> <p>23 THE STATE OF _____</p> <p>24 My Commission Expires: _____</p> <p>25</p>
<p>267</p> <p>1 CHANGES AND SIGNATURE</p> <p>2 WITNESS NAME: DATE OF DEPOSITION:</p> <p>3 CHRISTOPHER HANSON November 28, 2022</p> <p>4 PAGE/LINE CHANGE REASON</p> <p>5 _____</p> <p>6 _____</p> <p>7 _____</p> <p>8 _____</p> <p>9 _____</p> <p>10 _____</p> <p>11 _____</p> <p>12 _____</p> <p>13 _____</p> <p>14 _____</p> <p>15 _____</p> <p>16 _____</p> <p>17 _____</p> <p>18 _____</p> <p>19 _____</p> <p>20 _____</p> <p>21 _____</p> <p>22 _____</p> <p>23 _____</p> <p>24 _____</p> <p>25 _____</p>	<p>269</p> <p>1 STATE OF TEXAS )</p> <p>2 REPORTER'S CERTIFICATION</p> <p>3 I, DEBBIE D. CUNNINGHAM, CSR, hereby certify that</p> <p>4 the witness was duly sworn and that this transcript is a</p> <p>5 true record of the testimony given by the witness.</p> <p>6 I further certify that I am neither counsel for,</p> <p>7 related to, nor employed by any of the parties or</p> <p>8 attorneys in the action in which this proceeding was</p> <p>9 taken. Further, I am not a relative or employee of any</p> <p>10 attorney of record in this cause, nor am I financially</p> <p>11 or otherwise interested in the outcome of the action.</p> <p>12 I further certify that pursuant to FRCP</p> <p>13 Rule 30(f)(1) that the signature of the deponent was</p> <p>14 requested by the deponent or a party before the</p> <p>15 completion of the deposition and that the signature is</p> <p>16 to be before any notary public and returned within 30</p> <p>17 days from date receipt of the transcript. If returned,</p> <p>18 the attached Changes and Signature Page contains any</p> <p>19 changes and the reasons therefore.</p> <p>20 Subscribed and sworn to by me this day,</p> <p>21 December 20, 2022.</p> <p>22</p> <p>23 _____</p> <p>24 Debbie D. Cunningham, CSR</p> <p>25 Expiration: 6/30/23</p> <p>INTEGRITY LEGAL SUPPORT SOLUTIONS</p> <p>9901 Brodie Ln, Ste. 160-400</p> <p>Austin, Texas 78748</p> <p>www.integritylegal.support</p> <p>512-320-8690; FIRM # 528</p>